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0027649

FINAL MEETING MINUTES

Environmental Restoration Storage and Disposal Facility (ERSDF)
EPA Conference Room; April 13, 1993; 9:00 - 11:30

1. OPENING REMARKS

2. ACTION ITEMS:

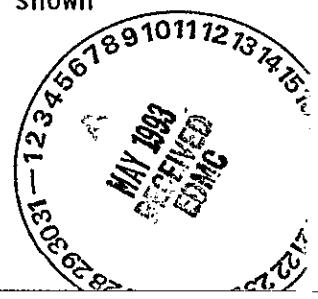
- ERSDF-1
Pamela Innis Clarify the implication of "Risk Based Criteria" within the CAMU Rule. (CLOSED)
- ERSDF-2
Rich Hibbard Evaluate the use of the W-5 trenches for ER generated mixed waste. (CLOSED)
- ERSDF-3
Moses Jaraysi Draft a list of suggested items to go into the letter from RL as a response to the CAMU letter coming from the regulators.
- ERSDF-4
Merl Lauterbach Prepare a detailed outline of the "package" that will be used for the CAMU application. The package should include a summary of the approach to satisfying the criteria specified in 40 CFR 264.552(c) and information on the proposed design options for the units.
- ERSDF-5
Bryan Foley DOE is to formally transmit the Site Evaluation Report for the ERSDF to the regulators.
- ERSDF-6
Vernon Dronen Westinghouse will outline the "barriers" to the use of the W-5 facility for disposal of past practice waste.

3. GENERAL DISCUSSION

Pamela Innis discussed some of the concerns voiced by EPA Headquarters (Dave Fagan & Ann Price) regarding the implementation of the CAMU rule at Hanford. The main concerns were:

1) The CAMU was essentially written to provide regulatory flexibility in dealing with the LDR requirements in the management of remediation waste. The application at Hanford focuses on the concerns of dealing with MTRs rather than LDRs. This is not a problem but a different twist to the rule. Application of CAMU at Hanford will be under intense scrutiny therefore the team must exercise caution in its implementation, taking a more conservative approach.

2) The CAMU rule specifies that it is "generally inadvisable to extend the CAMU to include areas that have not been environmentally degraded". It is recommended that the option of using land that is already contaminated be examined. If clean land is to be used it must be shown that use of these areas is more protective than managing waste in contaminated areas.



4. DESIGN CRITERIA

EPA expressed that there is no specific "risk based" criteria for the design of a CAMU disposal unit. The requirements for the design of the CAMU are similar to the nine criteria for remedy selection specified in the NCP. The criteria are listed in Section 264.552(c) of the rule. A risk assessment would be considered as part of the justification for the proposed design of the unit but other justification is necessary. Other suggested justification included modeling, a direct comparison to a RCRA design, the performance assessment alternative comparison, and a comparison to the performance standards. Merl Lauterbach of WHC questioned on whether a RCRA equivalency demonstration would be required. EPA noted that a demonstration would not be required, however EPA and Ecology both felt that a comparison of the proposed design(s) to the MTRs would be necessary. AT Kearney and Radian representatives then discussed risk assessment as it related to the proposed subpart S regulations, indicating that a more qualitative than quantitative risk assessment is proposed. EPA emphasized that the design of the facility will also be dependent on the assumptions that are made about items such as future land use and long-term climatic changes. The package that is prepared for an CAMU application should note these assumptions.

5. TREATMENT

EPA noted that throughout the CAMU rule emphasis is placed on the use of treatment to enhance the long-term effectiveness of a remedial action. It is EPA's position that reliance on containment with out treatment is strongly discouraged since disposal of untreated waste provides less reliable protection for human health and the environment. Ecology noted that both CERCLA and the Model Toxics Control Act state that sole reliance on containment for the management of waste is the least preferred alternative.

6. STATE RESPONSE ON USE OF THE W-5 BURIAL GROUND

Ecology stated that the concept of disposing waste in RCRA permitted trench seemed like an acceptable idea. However, all components of the permit must be complied with. Ecology requested that DOE-RL submit the details of the proposal including quantity of material; chemical composition of the material; fate of the waste originally scheduled for W-5 disposal; timing; and other issues such as packaging problems to Ecology and EPA as soon as possible.

7. PUBLIC INVOLVEMENT

Dennis Faulk, the EPA lead for public involvement on the ERSDF, noted that the quarterlies are scheduled for May 11 in Pasco and May 12 in Seattle. He noted that TWRS will be one of the main topics for these meetings but that the ERSDF will also be included. Pamela Innis noted that it may be appropriate to present the concept of CAMU at these meetings. The public

involvement team was asked to have a public involvement plan available for the May project manager meeting.

8. SITING STUDY AND RELATED CHARACTERIZATION ACTIVITIES

Vern Dronen of WHC noted that the ecological and archeological surveys should be done at the earliest possible time. The DOE has approved the Site Evaluation Report but has not been approved the preferred site at this time. WHC may be taking a risk in performing the surveys prior to DOE approval of the site. Of special concern is the land currently leased to Washington State. Ecology note that the 1000-acre area is to be dedicated to economic development, and utilization of the unit for other purposes may be highly scrutinized.

Ecology requested DOE to formally transmit the siting study for a thirty day comment period. Ecology stated that the decision to return the state leased land would not be made at the staff level and that the decision would be made at the governor's level.

Note The ERSDF Project may also be referred to as the "296 Project".

9. AGENDA ITEMS FOR THE APRIL 27 MEETING

Discussion of ERSDF letter from EPA and Ecology
General discussion of CAMU outline
Risk assessment committee involvement
Treatment

The next meeting is scheduled for 9:00 a.m. on April 27th in the EPA conference room, 712 Swift Blvd - Suite 5.

9/13/74 4:23 PM

ERSDF MEETING AGENDA
April 13, 1993 9:00
EPA Conference Room, 712 Swift Blvd

Opening remarks.

Items of Discussion:

Item 1: Application of CAMU

- o General discussion on application of CAMU at Hanford.
- o Specific discussions on the direct application of CAMU.

Objective 1: Clarify how risk based criteria should be applied in the design of a long term waste unit.

Objective 2: Clarify when treatment technologies are appropriate/necessary for wastes placed in a CAMU unit.

Item 2: Discuss Ecology's evaluation of the use of the W-5 trenches for ER generated mixed waste.

Item 3: Discuss/define a recommended list of items to be contained in letter from DOE-RL in response to the CAMU letter coming from the regulators.

Item 4: Discuss siting activities that need to be completed in the near term, specifically those defined in the siting study (ie. ecological survey, archeological survey, geologic/hydrologic characterization activities).

Review action items.

Determine agenda items for April 27 meeting.

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ERSDT MEETING

11-11-11

NAME	ORGANIZATION	PHONE
PAMELA INNIS	EPA	376-4919
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VERN DRONEN	WHC	2-2703
Rich Hibbard	Ecology	206 493-9367

01/32/11

ENVIRONMENTAL RESTORATION - STORAGE AND DISPOSAL FACILITY
(ERSDF) MEETING MINUTES

Distribution List:

Jay Augustenborg - DOE-RL/WMD
Suzanne Clarke - Dames & Moore
Michael Collins - DOE-RL/PMD
Audree DeAngeles - PRC
Vern Dronen - WHC
Julie Erickson - DOE-RL/ERD
Carrie Sikorski/Cathy Massimino - EPA Region 10
Bryan Foley - DOE-RL/ERD
Jim Goodenough - DOE-RL/ERD
Toby Michelena/Richard Hibbard - Ecology, Lacey
George Hofer - EPA Region 10
Dave Nylander/Moses Jaraysi - Ecology, Kennewick
Merl Lauterbach - WHC
Ann Price/Dave Fagan - EPA Headquarters
Fred Roeck - WHC
Ward Staubitz - USGS
Darci Teel/Ted Wooley - Ecology, Kennewick
EPA ERSDF File

Administrative Record - ER Storage and Disposal Facility (ERSDF)